

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CRIMINAL NO. 04-10288-RWZ

UNITED STATES OF AMERICA     )  
  )  
                  v.                                )  
  )  
  )  
CARLOS ESPINOLA, ET AL.,     )  
                  Defendants                    )

MOTION OF CARLOS ESPINOLA  
TO ORDER THE BUREAU OF  
PRISONS TO ENABLE HIS  
ACCESS TO MEDICATION

**NOW COMES CARLOS ESPINOLA**, having been sentenced to a term of incarceration by this Honorable Court on August 15, 2006, and respectfully prays that the Court order the Bureau of Prisons to enable his access to medically prescribed skin ointment creams, *Halobetasol*, and *Triamcinolone*.

Mr. Espinola, who suffers from Psoriasis, has tried unsuccessfully hitherto, to obtain both from his family, as well as from the prison medical center, these specific ointments, which the Bureau of Prisons does not carry or prescribe, and which his family has not been permitted to provide to him, at their expense.

Mr. Espinola requests that his family be allowed to mail to him directly, or to otherwise provide to a designated Bureau of Prisons official, solely at Mr. Espinola's and his family's expense, these medications as his needs require.

A copy of Mr. Espinola's physician's letter, as well as two separate prescriptions are attached herewith.

Respectfully submitted,  
CARLOS ESPINOLA  
By his attorney,

September 29, 2006

/s/ **Bradford Eliot Keene**

Bradford Eliot Keene  
BBO# 629440  
Keene & Gizzi, P.C.  
220 Broadway  
Suite 402  
Lynnfield, MA 01940  
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing System on September 29, 2006.

/s/ **Bradford Eliot Keene**

Bradford Eliot Keene

**DAVID TAUB, M.D.**

DERMATOLOGY

ZERO GOVERNORS AVENUE • SUITE B5 • MEDFORD, MASSACHUSETTS 02155 • TELEPHONE (781) 395-0075

September 28, 2006

Mr. Bradford Eliot Keene  
Attorney at Law  
220 Broadway Suite 402  
Lynnfield, MA 01940

RE: Carlos Espinola

Dear Mr. Keene:

Per your request, I am writing prescriptions for Mr. Carlos Espinola's condition.

As you know, he has chronic psoriasis. I have suggested to him that he use Halobetasol ointment twice a day for up to two weeks in the worst areas and rest for one week before reusing it. If the condition is under control, he may use the second ointment, Triamcinolone ointment, to maintain the clearing as needed. At this point, should there be any psoriasis in the groin area, he should use only Triamcinolone and limit that to two weeks at a time.

Very truly yours,



David Taub, M.D.

DT/jat

781 - 395-0075

DAVID J. TAUB, M. D.  
DERMATOLOGY

ZERO GOVERNORS AVENUE MEDFORD, MASS. 02155

NAME Charles Espinoza AGE 47 DATE 1/18/01  
ADDRESS \_\_\_\_\_

R Tetracycline 500mg  
800mg  
apply to skin bid  
for control  
1 vial M.D.

LABEL 5 INTERCHANGE IS MANDATED UNLESS  
REFILL 5 TIMES THE PRACTITIONER WRITES THE WORDS  
"NO SUBSTITUTION" IN THIS SPACE.

781 - 395-0075

DAVID J. TAUB, M. D.  
DERMATOLOGY

ZERO GOVERNORS AVENUE MEDFORD, MASS. 02155

NAME Charles Espinoza AGE 47 DATE 1/18/01  
ADDRESS \_\_\_\_\_

R Halohectasol 100mg  
600mg  
apply to skin bid  
For wound care  
1 vial M.D.

LABEL 5 INTERCHANGE IS MANDATED UNLESS  
REFILL 5 TIMES THE PRACTITIONER WRITES THE WORDS  
"NO SUBSTITUTION" IN THIS SPACE.